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*Attorney for Defendants Brian and
Corrina Colvin*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare, Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd, a New York corporation; Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and
wife; Brian Colvin and Corrina Colvin,
husband and wife; John Simon and Jean
Simon, husband and wife; William
McEwen and Patricia McEwen, husband
and wife; Rudy Chacon and Jane Doe
Chacon, husband and wife; and DOES 1
through 10, inclusive,

Defendants.

Case No. 2:23-CV-00226-DJH

**STIPULATION TO EXTEND
DEFENDANTS BRIAN AND CORRINA
COLVIN'S TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT**

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1 The parties, by and through counsel undersigned, stipulate to extend Defendants Brian
2 and Corrina Colvin's time to respond to Plaintiff's Motion for Summary Judgment, to and
3 including September 8, 2025.

4 The parties make this stipulation in good faith and not for the reason to unduly delay this
5 matter. Based on the showing of good cause, the parties therefore, request that the Court grant
6 their Stipulation to Extend Defendants Brian and Corrina Colvin's Time to Respond to
7 Plaintiff's Motion For Summary Judgment.

8 DATED this 3rd day of September, 2025.

9 **THE LAW OFFICE OF NINO ABATE, PLC**

10 By: /s/ Nino Abate

11 Nino Abate

12 *Attorney for Defendants Colvin*

13 **ENARA LAW PLLC**

14 By: /s/ Ross P. Meyer (with permission)

15 Ross P. Meyer

16 Morgan E. Silva

17 *Attorneys for Plaintiff*

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on this 3rd day of September, 2025, I electronically transmitted the
20 foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal
along with copies transmitted to all parties and counsel of record via the CM/ECF system.

21 By: /s/ Nino Abate